

FILED

Asheville

Dec 14 2021

U.S. District Court  
Western District of N.C.

## UNITED STATES DISTRICT COURT

for the

Western District of North Carolina

United States of America

v.

Case No. 3:21-mj-331

AUSTIN DELANO PAGE, and  
BRANDON ALEXANDER TEAGUE*Defendant(s)*

## RULE 4.1 - CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 1, 2020 through November 30, 2021 in the county of Mecklenburg in the  
Western District of North Carolina, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1341	Mail Fraud

This criminal complaint is based on these facts:

See Attached

☒ Continued on the attached sheet./s/ Timothy D. Stutheit*Complainant's signature*S.A. Timothy D. Stutheit*Printed name and title*

Sworn in accordance with Rule 4.1.

Signed: December 14, 2021

Date: 12/14/2021

W. Carleton Metcalf  
United States Magistrate JudgeCity and state: Asheville, North CarolinaW. Carleton Metcalf, USMJ WDNC*Printed name and title*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE, NORTH CAROLINA**

**AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT AND ARREST WARRANTS**

I, Special Agent Timothy Darin Stutheit with the Charlotte Field Office of the Federal Bureau of Investigation (FBI), Department of Justice, being duly sworn, state as follows:

**INTRODUCTION**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since January 1997. I am therefore an "investigative or law enforcement officer" of the United States within the meaning of Title 18 United States Code, Section 2510(7). I am empowered by law to conduct investigations, make arrests, and seize assets for federal felony violations. I completed new agent training in Quantico, Virginia, and I have received additional training in the investigation of federal criminal matters. I am currently assigned to the Complex Financial Crime squad in Charlotte, North Carolina. I have extensive experience leading investigations involving wire fraud, mail fraud, and securities fraud. I have also been the case agent and investigated several cases involving investment fraud and "Ponzi" schemes. I am familiar through my training and experience with the habits and practices of persons engaged in "Ponzi" schemes in violation of wire fraud, mail fraud, and securities fraud statutes. Before becoming a Special Agent with the FBI, I was a Certified Public Accountant (CPA), a Certified Management Accountant (CMA), and had over three (3) years of public accounting experience. During this public accounting experience, I reviewed the financial records of companies, prepared and audited financial statements, and prepared and reviewed individual, partnership, and corporate tax returns.

2. The information contained in this Affidavit is based on my own experience, investigation, and observations, as well as information relayed to me by others with knowledge of the investigation, to include representatives of the North Carolina Secretary of State's Office Securities Division, the Kings Mountain Police Department, the United States Marshal's Service, and an FBI Forensic Accountant. Because this Affidavit is being submitted for the limited purpose of establishing probable cause in support of the requested Arrest Warrants, I have not included every detail that I have learned over the course of this investigation.

3. Your Affiant has probable cause to believe that Austin Delano Page and Brandon Alexander Teague have engaged in a mail fraud scheme in violation of 18 U.S.C. § 1341.

### **BACKGROUND**

4. Law enforcement opened this investigation based upon information that Page and Teague may be operating an investment fraud utilizing D&T Investment Group, LLC (hereinafter referred to as D&T). North Carolina Secretary of State records show D&T was formed on October 2, 2020, with an address of 510 East King Street, Kings Mountain, NC 28086. Bank of America bank account records reflect that D&T opened accounts on or about November 23, 2020, with Page and Teague as authorized signers. Investors report making investments with D&T beginning in or around the fall of 2020 and continuing through November 2021.

5. On or about December 2, 2021, employees of D&T were informed by Page that D&T would be shutting down. Shortly thereafter, law enforcement was inundated with complaints from D&T investors that believed they were victims of fraud.

6. According to Department of Homeland Security records, Page and Teague departed Charlotte on November 30, 2021, with a destination of Milan, Italy, on December 2, 2021, with no return flight scheduled.

### **INTERVIEW OF FORMER EMPLOYEE**

7. On December 10, 2021, a former employee of D&T was interviewed who worked for Page and Teague. The employee stated that Teague owned 49% of D&T and Page owned 51%. The employee estimated there are over 350 investors/victims in D&T with a total of approximately \$6,000,000 invested. After returns, the former employee estimated that investors were currently owed between \$12,000,000 and \$18,000,000.

8. The former employee stated that Page represented himself as wealthy and guaranteed investors that they would not lose their principal due to his wealth.

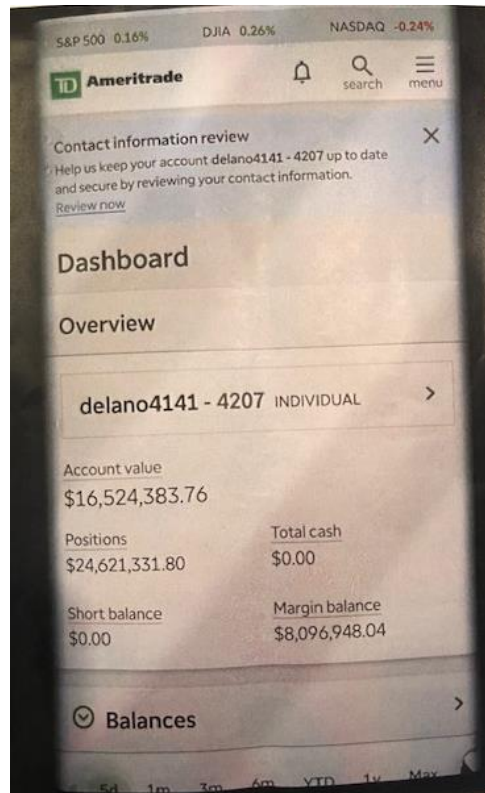
9. The former employee stated that D&T also had investors in South Carolina and Florida that were either called telephonically or e-mailed. Statements were also sent to investors through the United States Postal Service and by e-mail communications.

10. Page told the former employee that he was registered and licensed to sell securities. According to the North Carolina Secretary of State's Office and FINRA, Page is not licensed to sell securities.

11. The former employee stated that before starting D&T Investments, Page and Teague were car salesmen and sales representatives selling campers. According to Employment Securities Commission information, shortly before starting the investment firm D&T, Page and Teague were most recently employed at Seven Six Automotive from 2017-2019 and Campers Inn of Kings Mountain from 2019-2020.

12. The former employee also stated that in or about the end of September 2021, D&T was having "cash flow issues" and had checks made payable to investors returned for insufficient funds and there also were payroll issues. The former employee confronted Teague and told Teague that he did not believe there were sufficient funds in the accounts to pay the investors back and

that Teague was going to go to jail. Shortly thereafter, Page sent the former employee this screenshot showing an account value at TD Ameritrade for account x4207 of over \$16,000,000, which the former employee believed to be true.



13. On December 10, 2021, law enforcement shared the screenshot with a TD Ameritrade representative who informed law enforcement the image was fraudulent. In fact, as of September 30, 2021, TD Ameritrade Account x4207 had a balance of only \$6.76 as reflected below.



Statement Reporting Period:  
09/01/21 - 09/30/21

800-869-3900  
TD AMERITRADE  
DIVISION OF TD AMERITRADE INC  
PO BOX 2209  
OMAHA, NE 68103-2209  
TD Ameritrade Clearing, Inc., Member SIPC

Statement for Account # 490-674207  
AUSTIN DELANO PAGE  
316 JIM CLINE RD  
LAWNDALE, NC 28090-9417

Investment	Portfolio Summary			
	Current Value	Prior Value	Period Change	% Change
Cash	\$ -	\$ -	\$ -	-
Insrd Dep Acct (IDA)	6.76	6.76	-	-
Money Market	-	-	-	-
Short Balance	-	-	-	-
Stocks	-	-	-	-
Short Stocks	-	-	-	-
Fixed Income	-	-	-	-
Options	-	-	-	-
Short Options	-	-	-	-
Mutual Funds	-	-	-	-
Other	-	-	-	-
Total	\$6.76	\$6.76	\$ 0.00	-

14. On December 10, 2021, law enforcement received trading records from TD Ameritrade for Account x4207 as well as other accounts associated with Teague, Page, and D&T. The statements show the value in the D&T trading account at the end of September 2021 to be \$75.09, and there is currently a negative balance in the D&T trading account and a combined balance of less than \$50 in the personal accounts of Page and Teague. Similarly, Bank of America has indicated that the balances of the accounts of D&T are negative. Law enforcement is not aware of any other D&T bank or trading accounts. Thus, it does not appear there are sufficient funds available to pay investors.

15. The former employee stated that D&T employees generally had a meeting every Wednesday. On Wednesday December 1, 2021, Page contacted the former employee and cancelled the meeting, stating that he was busy at Chase Bank and Teague had just received a COVID-19 shot. However, according to Department of Homeland Security records, Page and Teague departed

Charlotte on November 30, 2021, with a destination of Milan, Italy, on December 2, 2021, with no return flight scheduled.

16. The following day, on December 2, 2021, Page sent the former employees an e-mail that stated D&T would be closing.

### **INTERVIEWS OF INVESTORS**

17. Interviews of D&T investors reveal that they met with Page and/or Teague before investing in D&T, and Page and/or Teague signed the investor agreements. Based upon representations from Page and/or Teague, investors believed that their money would be invested in stocks, and the investors were promised that they were guaranteed not to lose any investment principal. Investors were sent statements, signed by Page or Teague, via the United States Postal Service and via wire transmissions such as e-mail, showing their investments growing by as much as 40% per month.

18. D&T investors were told that Page was licensed to sell securities. According to the North Carolina Secretary of State's Office and FINRA, Page is not licensed to sell securities.

19. Certain D&T investors reported that Page showed them a screenshot from his phone reflecting an account balance in excess of \$16,000,000 in September 2021.

### **SUMMARY OF FINANCIAL ANALYSIS**

20. As of the date of this affidavit, bank records are only available to law enforcement through August 31, 2021.

21. Based upon a review of the D&T account records from Bank of America from the accounts' inception in November 2020 through August 2021 by an FBI Forensic Accountant, it appears that millions of dollars in investor money was deposited into these accounts. It does not appear that the majority of investor funds were actually invested. Instead, it appears that Page and

Teague used a significant amount of investor funds to make “Ponzi payments” to other investors and to pay personal expenses of Page and Teague, to include the following:

- a. Over \$100,000 in Zelle transfers to Austin Page;
- b. Over \$50,000 in Zelle transfers to Brandon Teague;
- c. Over \$450,000 in cash withdrawals;
- d. Over \$70,000 in luxury car rentals;
- e. Over \$66,000 to Caesars Palace and Caesars Hotel and Casino in Las Vegas, Nevada;
- f. Over \$40,000 in other hotel expenses;
- g. Over 30,000 in Airbnb expenses;
- h. Over \$30,000 in purchases from Bentley’s restaurant;
- i. Over \$20,000 in purchases from Louis Vuitton;
- j. Over \$20,000 in purchases from Nordstrom;
- k. Over \$18,000 in purchases from Total Wine; and
- l. Numerous other personal expenses.

22. Based upon a review of trading records, it does not appear that the majority of investor funds were actually invested. Further, it appears that the investment returns claimed on the statements sent to investors via mail and wire communications were fictitious.

### **CONCLUSION**

23. It appears as if the investors’ money has not been invested as promised and the investors’ money has been primarily used to pay off other investors, as well as to fund personal expenses of Page and Teague. Probable cause exists that Austin Delano Page and Brandon Alexander Teague operated what is commonly referred to as a “Ponzi” scheme, and that they have now fled to Italy.



24. Based upon the foregoing, your Affiant submits there is probable cause to believe that from at least November 2020 through December 2021, in the Western District of North Carolina, and elsewhere, Austin Delano Page and Brandon Alexander Teague, with the intent to defraud, devised a scheme to defraud and/or obtain money by means of false or fraudulent pretenses, representations or promises, and, for the purpose of executing or attempting to execute that scheme, they knowingly sent or caused to be sent and delivered by the Postal Service, various materials, in violation of 18 U.S.C. § 1341.

/s/ Timothy Darin Stutheit  
SPECIAL AGENT TIMOTHY DARIN STUTHEIT  
FEDERAL BUREAU OF INVESTIGATION

*This affidavit was reviewed by Assistant United States Attorney Daniel Ryan.*

In accordance with Rule 4.1(b)(2)(A), the Affiant attested under oath to the contents of this Affidavit, which was submitted to me by reliable electronic means, on this 14th day of December, 2021, at 2:02 PM

Signed: December 14, 2021



W. Carleton Metcalf  
United States Magistrate Judge

